

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION**

FRANCISCAN ALLIANCE, INC.,  
*et al.*,

*Plaintiffs,*

v.

XAVIER BECERRA, *et al.*,

*Defendants.*

**No. 7:16-cv-00108-O**

**PLAINTIFFS' MOTION FOR  
AWARD OF ATTORNEY'S  
FEES AND EXPENSES**

Pursuant to 42 U.S.C. § 1988(b) and this Court's order setting the deadline for filing a petition for attorney's fees and expenses, Dkt. 219, Plaintiffs respectfully move this Court for an order requiring Defendants to pay Plaintiffs' reasonable attorney's fees and expenses, as set out in the memorandum filed in support of this motion. Plaintiffs are the prevailing parties under the Court's judgment. *See* Dkts. 182, 206, 211.

A memorandum in support of this motion satisfying the requirements of Local Rule 7.1(d), accompanying exhibits, and a proposed order are filed contemporaneously with this motion. The exhibits include:

Exhibit 1: Goodrich Declaration

Exhibit 1-A: Summary of Fees

Exhibit 1-B: Summary of Requested Expenses

Exhibit 1-C: Contemporaneous Billing Records

Exhibit 1-D: Billing Judgment Deletions

Exhibit 1-E: Goodrich Resume

Exhibit 1-F: Rienzi Resume

Exhibit 1-G: Windham Resume

Exhibit 1-H: Barclay Resume

Exhibit 1-I: Thomson Resume

Exhibit 1-J: Davis Resume  
Exhibit 1-K: Chen Resume  
Exhibit I-L: Busick Resume  
Exhibit 2: Schaerr Declaration  
Exhibit 3: Robison Declaration

WHEREFORE, Plaintiffs respectfully request that the Court order Defendants to pay attorney's fees and expenses, in the amount set out in the memorandum filed in support of this motion.

Dated: December 23, 2022

Respectfully submitted,

/s/ Luke W. Goodrich

Luke W. Goodrich

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Illinois, LLC*

### **CERTIFICATE OF CONFERENCE**

On December 15, 2022, counsel for Plaintiffs, Luke W. Goodrich, informed Bradley Humphreys, counsel for HHS, of Plaintiffs' intent to file this motion and accompanying memorandum. On December 21, 2022, Mr. Humphreys indicated that HHS opposes the motion.

/s/ Luke W. Goodrich  
Luke W. Goodrich

### **CERTIFICATE OF SERVICE**

I hereby certify that on December 23, 2022, the foregoing was served on all parties via ECF.

/s/ Luke W. Goodrich  
Luke W. Goodrich